

SANTA MONICA MOUNTAINS CONSERVANCY

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Mr. Jon Foreman
City Planner/Project Coordinator
Department of City Planning
200 N. Spring Street, Room 601
Los Angeles, California 90012

**Comment Letter on the Notice of Preparation and Initial Study for the
Universal City Vision Plan, ENV 2007-0254 EIR**

Dear Mr. Foreman:

The Santa Monica Mountains Conservancy (Conservancy) offers the following comments on the Notice of Preparation and Initial Study for the Universal City Vision Plan, ENV 2007-0254 EIR (Project) located between the Santa Monica Mountains and the Los Angeles River. These comments address the Project's potential significant impacts on viewshed, water quality, recreation and open space, transportation and circulation, and biological resources. In addition, the Conservancy requests a clarification for the separate DIERS addressing of the Metro Universal project and the Universal City Vision Plan as opposed to a unified document.

The Project would drastically change the character of a large area and surrounding neighborhoods with the proposed construction of tall commercial buildings, a residential project of 2,937 units, and a 500 room hotel. These visual, traffic (biological), and watershed related impacts would be unavoidable significant and adverse. CEQA requires the avoidance or substantial reduction of such impacts with project changes.

Natural Medium-Scale Storm Water Biological Treatment Areas

The project and most DEIR alternatives would result in significant increases in pollutants entering storm drains both on and offsite. In addition, the further development of the site would significantly reduce groundwater recharge in a unique area adjacent to the Los Angeles River. To compensate for these adverse effects the project and all of its

economically feasible DEIR alternatives must include medium-scale infiltration areas to remedy both impacts. Such infiltration areas should be a minimum of 15,000-square-feet in size with 5,000-square-feet of buffer. The 356-acre site should include at least 20 acres of natural infiltration area. Such features provide additional benefits such as habitat for birds and open space for public passive recreation and urban relief.

Cahuenga Pass Traffic Volume - Wildlife Movement

The Cahuenga Pass is the lifeline habitat linkage between the Santa Monica Mountains and Griffith Park. If the Mulholland Drive bridge over US-101 in the pass becomes unusable to wildlife, the population of all large mammals in Griffith Park will become inbred. Likewise, if a fire eliminates or nearly eliminates a species, there would be no other means for the City's largest park to be repopulated.

The DEIR must look at the Project's traffic impacts at least as far as the Cahuenga Pass. The current condition of Cahuenga Pass wildlife corridor is rapidly degrading due to increased traffic volume. The Project's potential of increasing traffic will further the rate of deterioration. In addition, the construction of a house just south of the Mulholland bridge on the east side of Cahuenga Pass adds to the problem. The traffic study must also include and identify several other projects that are either on-going or scheduled for a future date, such as the Metro Universal Project and the Hollywood redevelopment project.

Because of the proposed increase in traffic and vehicles within Cahuenga Pass, the Project's traffic study area must extend along Cahuenga Pass and analyze traffic flow and rates throughout a 24 hour period over several days throughout the year, particularly near the Mulholland Drive and Vine Street overpass where wildlife crossings have been informally documented. The potential increase of traffic will significantly impact wildlife movement within the area. The Conservancy also suggests that the Project conduct a wildlife movement study of Cahuenga Pass for the efficacy of the following mitigation measures. As proposed mitigation the applicant must be required to provide a \$4 million fund to the Mountains Recreation and Conservation Authority (MRCA) to be used solely to acquire and manage land directly tied to wildlife movement within half a mile of the Mulholland bridge.

Santa Monica Mountains' Cahuenga Pass - Los Angeles River Connector Alternative

The Conservancy agrees with the Initial Study that the DEIR analyze the Project's potential impact on Griffith Park, Significant Ecological Area No. 39. To provide adequate open space the Project has the opportunity to create and enhance a greenbelt through the eastern portion of the Project site (see attached figure). The Conservancy recommends that a

conservation easement or fee-simple title over the eastern portion of the Project site be given to the MRCA and the Los Angeles City Department of Recreation and Parks.

The Initial Study cites the potentially significant impacts on biological resources including substantial adverse effects on various significant vegetation communities including coast-live oak, chaparral, riparian, ruderal, and cultivated landscapes. These communities are hosts to diverse populations of wildlife. The value of this land is enhanced by a good potential land connection across Barham Boulevard to the south side of the Oakwood Apartments. Essentially, via Griffith Park, this land is biologically connected to the Santa Monica Mountains' core habitat. To avoid significant biological impacts the Conservancy's full recommended open space easement area must be adopted. The open space to development square footage ratio, even with this southeastern permanent open space area, is still poor.

The subject onsite open space area can also double as a trail corridor for local denizens to and from the Los Angeles River. How else can the project adequately contribute to the shortage of accessible park and open space areas? Dedicating a portion of the Universal Village District to wildlife habitat and open space is essential for public parks. A trail easement for public use should also be given to MRCA and the Los Angeles City Department of Recreation and Parks. The attached figure details potential trail alignments within the conservation easement to and from the Los Angeles River. Maintenance of both the conservation easement and trail easement can be performed by MRCA crews and sworn park rangers funded by a Landscape Maintenance District.

We respectfully request to receive all future documentation to be sent to the attention of Paul Edelman, Deputy Director of Natural Resources and Planning, at the above address and that questions be direct to his attention at (310) 589-3230, ext. 128.

Sincerely,

ELIZABETH CHEADLE
Chairperson